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Attorneys for COUNTY OF ALAMEDA, also sued herein as "ALAMEDA COUNTY SHERIFF'S DEPARTMENT" and "ALAMEDA COUNTY COMMUNITY DEVELOPMENT AGENCY"

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JESUS CORTEZ; ENRIQUE GONZALEZ; ALFREDO ESQUIVEZ; LUIS PEREZ; ABELINO ESPINOZA; MANUEL DUNENAS; RAMON PEREZ; JOSE GARCIA; SOCORRO ZENDEJAS; and PABLO DUENAS, Plaintiffs, v. COUNTY OF ALAMEDA; ALAMEDA COUNTY SHERIFF'S DEPARTMENT; ALAMEDA COUNTY COMMUNITY DEVELOPMENT AGENCY; ACCLAMATION INSURANCE MANAGEMENT SERVICES; SHERIFF GREGORY J. AHERN; DEAN N. STAVERT; BARBARA BOWMAN; JAMES LINN; TONA HENNINGER; LINDA GUDINA; HAL BANCROFT; JOHN KRIEGE; GARY PARHAM; MIKE BUSH; DALE SILVA; DICK ANGEL; DOES 1 to 50, Defendants.	Case No.: 14-4035 **NOTICE OF REMOVAL** State court complaint filed on: August 15, 2014

TO PLAINTIFFS AND THEIR ATTORNEY OF RECORD:

PLEASE TAKE NOTICE THAT defendant COUNTY OF ALAMEDA (sued herein as itself, and also sued as "ALAMEDA COUNTY SHERIFF'S DEPARTMENT" and

"ALAMEDA COUNTY COMMUNITY DEVELOPMENT AGENCY"), pursuant to 28 U.S.C. sections 1331, 1441(a) and (c), 1446 and 1367, hereby files this Notice of Removal to remove this action to this court from the Superior Court for the County of Alameda, California.

Attached hereto as **Exhibit A** is a true and correct copy of the Summons and Complaint, for case no. RG14736929, filed on August 15, 2014, in the Alameda County Superior Court.

This court has jurisdiction over this action pursuant to 28 U.S.C. sections 1331, 1441(a) and (c), 1446 and 1367, based on the fact that the complaint alleges one or more claims arising under federal law, specifically one or more claims arising under 42 U.S.C. section 1983, for violation of the First, Fifth and Fourteenth Amendments to the United States Constitution. Any state law claims arise under the same nucleus of facts as the federal claim(s), and so supplemental jurisdiction exists in such claim(s).

Venue is proper in this court because the County of Alameda lies within the geographical boundaries for the Northern District of California, and the parties, witnesses and property at issue also lie within the boundaries of the Northern District of California.

The County of Alameda is not aware of any other defendants having been served with this action at this time. No proofs of service are on file in the Alameda County Superior Court. A true and correct copy of all other documents currently on file with the Alameda County Superior Court as of the time of filing of this Notice of Removal are attached hereto as **Exhibit A** (Summons and Complaint) and **Exhibit B** (State Court Civil Cover Sheet, State Court Notice of Assignment of Judge For All Purposes, and State Court Notice of Initial Case Management Conference).

Dated: September 5, 2014

DONNA R. ZIEGLER
County Counsel, in and for the
County of Alameda, State of California

By: */s/ Jill Sazama*
JILL P. SAZAMA, Deputy County Counsel

Attorneys for COUNTY OF ALAMEDA, also sued herein as "ALAMEDA COUNTY SHERIFF'S DEPARTMENT" and "ALAMEDA COUNTY COMMUNITY DEVELOPMENT AGENCY"

CERTIFICATE OF SERVICE

I, Dalia Liang, declare:

I am employed by the Office of the County Counsel, County of Alameda, in the State of California. I am over the age of 18 years and not a party to the within case. My business address is 1221 Oak Street, Suite 450, Oakland, CA 94612-4296, which is located in the city where the below-described service occurred.

I am readily familiar with the business practice at my place of business for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, outgoing correspondence is collected every day from a designated place for collection and deposited with the United States Postal Service the same day.

On September 5, 2014, following ordinary business practices, I placed a true and correct copies of the following documents, in a fully pre-paid envelope sealed and addressed as follows, for collection and mailing with the Unites States Postal Service.

DOCUMENT(S) SERVED:

1. NOTICE OF REMOVAL (WITH EXHIBIT A, EXHBIT B)

2. CERTIFICATE OF SERVICE

PARTY/IES SERVED:

Daniel L. Mitchell *Counsel for Plaintiffs*
Law Offices of Daniel L. Mitchell
1151 Harbor Bay Parkway, Suite 121
Alameda, CA 94502

Telephone: 510-864-8885
Facsimile: 510-864-8898

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed at Oakland, California, on September 5, 2014.

/s/ Dalia Liang

Dalia Liang